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Subject DPP Comments - again

Sorry I forgot to attach my comments last time Here they are



- DPPCOM 2

AR-99-000034
ADMIN RECCRD 1/4
SW-SW-A-003210

Decommissioning Program Plan Comments

(Note the majority of these comments were submitted to DOE in September 1997 but have not been adequately resolved)

DPP Specific Comments

- 1 Section 1 Introduction - Once each building's mission has ended and the building is in a "safe and stable" configuration, any additional activities are considered decommissioning per RFCA. This section should be revised accordingly.
- 2 Include definition of deactivation in Section 1.1.1 - this definition is significant in terms of what activities are not considered deactivation under RFCA.
- 3 Section 1.1.2 - the statement "[the DPP] establishes the general procedures for decommissioning" is inaccurate. As written, the DPP identifies the overall framework, the FDMP identifies the overall procedure and sequence to be used, and the RSOP is a very brief summary of the FDMP.
- 4 Section 1.1.4 RSOPs - "[RSOPs] defined as an approved protocol applicable to a set of routine environmental restoration and/or decommissioning activities" As written, this statement is inaccurate. The only information the RSOP provides is a simplified sequence of events.

"RSOPs provide a description of each work activity" - this statement is inaccurate. As written, the FDMP provides a brief description of each activity. The RSOP should be more activity-specific, not less. In addition, the term "activity" is misleading. As written, activity in the RSOP is considered decommissioning of a building/facility as opposed to implementation of an action (e.g., surveying, abatement, decontamination, etc.).
- 5 Section 2.3 Project Approach - one of the numerous documents (FDMP, DPP, etc.) should identify a list of non-nuclear and nuclear buildings, their anticipated type (1-3), and their current and anticipated future missions. Additionally, aren't all non-production buildings immediately in a decommissioning phase once their missions have ended?

This section is misleading; the DNFSB's main focus is on safety, not necessarily deactivation activities. In addition, their primary concern is with the former plutonium buildings and would likely have no significant interest in Type 1 or 2 buildings. It should also be noted that the AEA is self-implemented by DOE.

The DPP needs to define "mission activities." If this term is used to describe SNM stabilization and safety-related issues, then it is true that the DNFSB has the lead oversight role. However, many other deactivation activities that RFETS may consider "mission activities" are regulated by CDPHE. This section should include language clarifying CDPHE's regulatory jurisdiction over many deactivation activities prior to decommissioning (i.e., treatment and storage of mixed residues, idle equipment, excess chemical removal, etc.).
- 6 Section 2.3.1 End of Mission - again, a list of each building's current and anticipated mission should be included somewhere in this document.
- 7 Section 2.3.2 Building Deactivation - define 1) equipment, 2) residues, 3) significant hazards,

and 4) the process/mechanism for the shift in primacy from AEA and DNFSB to RFCA

- 8 Section 2 3 3 Building Decommissioning - the DPP states that "the Site has more than 200 buildings that supported nuclear weapons production" Assuming most if not all of these buildings are considered type 2 or 3, it appears the Site plans on submitting over 200 decision documents (e g , PAMs/RSOPs or IM/IRAs) If the Site anticipates grouping these buildings into "clusters", how many clusters are anticipated and what will each cluster consist of? This list should be included in the DPP
- 9 Section 3 4 2 Facility Walk Down - to include any analytical verifications (e g , sampling and analysis, physical surveys, etc)?
- 10 3 4 2 2 Reconnaissance Level Characterization - this section should describe the criteria used and information needed to support and develop an adequate RLC report (possibly referencing the *RMRS Decommissioning Characterization Protocols* is adequate) Information must be provided to determine how a room/area should be evaluated (e g , a Class 1, 2 or 3 or an unaffected area) in accordance with NUREG 5849, MARSSIM, and/or other applicable regulations
- 11 Section 3 4 4 Characterization Report - based on what minimum physical/analytical data?

Include language regarding the LRA approval of the *RMRS Decommissioning Characterization Protocols* prior to implementing decommissioning activities on Type 1 buildings
- 12 Section 3 4 7 1 Decommissioning Operating Plan - the DOP should also include a deactivation/decommissioning checklist and walk-down verification

Define "controls" under Project Approach

Shouldn't the Health and Safety section address emission controls?

Waste Management - this section should also included the anticipated duration of staging and/or on-site storage

Implementation Schedule - clarify last sentence to read " [the schedule] may not be to a level identifying individual glovebox, tank or equipment removal " Although for the majority of the buildings this statement will be true, there also may exceptions depending on the complexity of the unit (i e , certain gloveboxes or tank systems in Building 771)
- 13 Section 3 4 7 2 - Why must the Site wait ten days for implementation following LRA approval of the DOP?
- 14 Section 3 4 8 4 Dismantlement/Demolition Operations - "additional measures must be taken to prevent the spread of radiological contamination" In what plans will these measures be identified?
- 15 Section 3 4 9 3 Waste Disposition - "appropriate surveys" in accordance with what procedures?
- 16 Section 3 4 10 1 Post-Strip Out - when will a third party validation be required? Who's responsible for this decision?

General Comments Related to the DPP and RSOP integration

(Note these general comments are based on my review of the draft RSOP submitted in September 1997 To date, a revised RSOP has not been provided and I'm unclear as to the proposed path-forward for RSOPs)

As written, the 9/16/97 draft RSOP is inadequate As written, the RSOP comes nowhere near its intended mission as a "replacement for an individual PAM or IM/IRA for each remedial activity" The RSOP has been defined by the Site as "an approved protocol applicable to a set of routine environmental restoration and/or decommissioning activities" As written, the RSOP provides no useable information Rather it summarizes generic information found in the FDMP In my opinion, the RSOP(s) should provide either 1) detailed, building specific, information for the decommissioning of each building or cluster (e g , rooms to be surveyed, waste to be generated and dispositioned, ARARs, constituents and areas to sampled and analyzed, monitoring requirements, etc), in other words distinct and direct procedures and requirements, or 2) procedures for specific activities (e g , asbestos abatement requirements/procedures, lead-based paint characterization and dispositioning, decontamination of gloveboxes, etc) The RSOP cannot be both an IM/IRA type document and an activity specific SOP